

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:18-CV-68
	)	
UNITED STATES OF AMERICA, <i>et al.</i> ,	)	
	)	
Defendants,	)	
	)	
KARLA PEREZ, <i>et al.</i> ,	)	
	)	
Defendant-Intervenors,	)	
and	)	
	)	
STATE OF NEW JERSEY,	)	
	)	
Defendant-Intervenor.	)	

**DEFENDANT-INTERVENOR’S UNOPPOSED MOTION TO ADMIT COUNSEL  
PRO HAC VICE AND TO WITHDRAW COUNSEL**

Defendant-Intervenor State of New Jersey (“New Jersey”) moves to make the following changes to its designated counsel in the above-captioned case as a result of internal organizational changes within the New Jersey Office of the Attorney General, Division of Law.

First, New Jersey respectfully requests that the Court admit *pro hac vice* Deputy Attorneys General Shireen A. Farahani, Amanda I. Morejón, and Samuel L. Rubinstein. All listed counsel will be representing New Jersey in this matter. Individual *pro hac vice* forms for each attorney are attached as exhibits to this motion.

Second, New Jersey respectfully requests that the Court withdraw Eric L. Apar, Elspeth L. Faiman Hans, Jeremy Hollander, Kenneth S. Levine, and Rachel Wainer Apter as counsel of

record because they are no longer representing New Jersey in this matter. New Jersey also requests that the Clerk remove Mr. Apar, Ms. Hans, Mr. Hollander, Mr. Levine, and Ms. Wainer Apter from all electronic or paper correspondence in this matter.

This motion will not cause undue delay and will not adversely affect the interests of New Jersey. The motion is unopposed.

For these reasons, New Jersey respectfully requests that the Court grant this Motion.

Dated April 6, 2023

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Mayur Saxena  
Mayur Saxena, Assistant Attorney General  
Attorney in Charge  
(admitted *pro hac vice*)  
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*Attorneys for Defendant-Intervenor  
State of New Jersey*

**CERTIFICATE OF CONFERENCE**

I certify that on April 6, 2023, counsel for the parties conferred regarding the relief requested in this motion and counsel for Plaintiffs, Federal Defendants, and the Perez Defendant-Intervenors each advised that they do not oppose this motion.

/s/ Mayur Saxena

Mayur Saxena

**CERTIFICATE OF SERVICE**

I certify that on April 6, 2023, I caused this document (and exhibits hereto) to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Mayur Saxena

Mayur Saxena